



Bret Grote <bretgrote@alcenter.org>

Jung v. City of Philadelphia - Proposed Protective Order for Discovery Materials

Michael Pestrak <Michael.Pesttrak@phila.gov>
To: Bret Grote <bretgrote@alcenter.org>
Cc: Nia <nia@alcenter.org>

Wed, May 28, 2025 at 1:50 PM

14 days works.

From: Bret Grote <bretgrote@alcenter.org>
Sent: Wednesday, May 28, 2025 1:49 PM
To: Michael Pestrak <Michael.Pesttrak@phila.gov>
Cc: Nia <nia@alcenter.org>
Subject: Re: Jung v. City of Philadelphia - Proposed Protective Order for Discovery Materials

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Thanks so much. How about 14 days?

I can send to Tom and Jonathan too and cc you.

On Wed, May 28, 2025 at 1:29 PM Michael Pestrak <Michael.Pesttrak@phila.gov> wrote:

I have attached the red line of the changes. As discussed seven days can be a place holder for a more agreeable time frame.

Thanks,
Mike

From: Bret Grote <bretgrote@alcenter.org>
Sent: Friday, May 23, 2025 1:30 PM
To: Michael Pestrak <Michael.Pesttrak@phila.gov>
Cc: Nia Holston <nia@alcenter.org>; Rupalee Rashatwar <rupalee@alcenter.org>; Margaret Hu <margo@alcenter.org>; Thomas Gregory <tgregory@okllp.com>; sbaker@kiernantrebach.com <sbaker@kiernantrebach.com>; JKaminsky@kiernantrebach.com <JKaminsky@kiernantrebach.com>
Subject: Re: Jung v. City of Philadelphia - Proposed Protective Order for Discovery Materials

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Mike,

Good afternoon. Following up on this email to ask that you please provide your office's position on the proposed protective order in advance of our meeting next week. It was sent on May 6th.

Additionally, in light of the court's order yesterday that only granted an additional 60 days for discovery, and which stated that no further extensions will be granted, we are reiterating that we need prompt - very prompt - production of documents and interrogatory responses that we have been discussing. The scheduling order requires us to seek prompt court intervention if they are not forthcoming.

We look forward to a productive meeting in the coming week.

Tom, we will soon be following up with you in regard to your production to date.

Jon, we are re-attaching the proposed protective order here, as this was circulated before you entered your appearance.

Sincerely,

Bret Grote
Legal Director
Abolitionist Law Center

On Tue, May 6, 2025 at 7:48 AM Nia Holston <nia@alcenter.org> wrote:

Good morning counsel,

Please find a proposed protective order from Plaintiffs for patient protected health information contained within discovery materials attached to this email for the above captioned case. Please let us know if you consent, or if you have further edits.

Best,

Nia Holston

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Nia Holston
Staff Attorney
Abolitionist Law Center
nia@alcenter.org

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